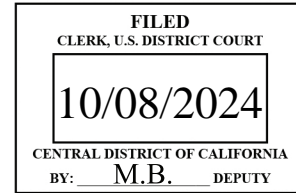


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

v.

ARTHIT TANJAPATKUL,

Defendant.

Case No. **8:24-mj-00496 DUTY**

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of October 13, 2023, in the County of Orange in the Central District of California, the defendant violated:

Code Section
18 U.S.C. § 922(o)

Offense Description
Unlawful possession of a machinegun

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/

Complainant's signature

FBI Special Agent Daniel Dales

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 10/8/2024

Judge's signature

City and state: Santa Ana, California

John D. Early, U.S. Magistrate Judge.

Printed name and title

AUSA: Kedar S. Bhatia (x4442)

AFFIDAVIT

I, Daniel Dales, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Arthit TANJAPATKUL for a violation of 18 U.S.C. § 922(o) (unlawful possession of a machinegun).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only, and all dates and times are on or about those indicated.

II. BACKGROUND OF THE AFFIANT

3. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since July 2017. I am currently assigned to the Federal Bureau of Investigation Los Angeles Field Office Long Beach Resident Agency Domestic Terrorism Squad, which investigates residents of the United

States who use force or violence in furtherance of a political and/or social agenda in violation of federal law. As an FBI Special Agent, I have received both formal and informal training from the FBI and other institutions regarding electronic communications and the use of the internet and digital devices in furtherance of domestic terrorism crimes. I have also participated in numerous investigations involving subjects who use the internet and electronic communications to research and facilitate those crimes, including through obtaining and executing search warrants.

III. SUMMARY OF PROBABLE CAUSE

4. As set forth below, the FBI has learned that Arthit TANJAPATKUL was using the internet to sell stolen military equipment, including high-powered lasers and firearms scopes. TANJAPATKUL was a sophisticated seller of the equipment, often discussing with counterparties the specifications of the equipment and discussing the fact that this equipment was restricted by the federal government. The equipment was stolen by a military officer ("CC-1"), who was previously convicted and sentenced for his conduct. Between July 2014 and April 2019, TANJAPATKUL sent approximately \$277,000 to CC-1.

5. In October 2023, agents searched TANJAPATKUL's home pursuant to a judicially authorized search warrant, finding approximately 71 items that were military equipment initially

stolen by CC-1. Agents also found dozens of firearms, including four machineguns.

6. Later, when searching TANJAPATKUL's cellphone, which was seized as part of the search in October 2023, agents saw evidence of TANJAPATKUL's sale of the stolen military equipment and his knowing possession of the machineguns. On a hard drive seized from TANJAPATKUL's residence, officers found suspected child sexual abuse materials, with file names referring to children as young as seven years old.

7. In July 2024, agents searched TANJAPATKUL's storage unit pursuant to a judicially authorized search warrant. In the storage unit, agents found approximately 26 firearms not registered to TANJAPATKUL, yet more stolen military equipment, including approximately 192 more devices that had been stolen by CC-1, and a large volume of suspected child sexual abuse materials.

8. TANJAPATKUL is set to board an international flight on October 9, 2024, and thus the government is seeking the requested criminal complaint and arrest warrant to prevent his flight from the United States.

IV. STATEMENT OF PROBABLE CAUSE

A. Background on FDA-Regulated Laser Aiming Sights

9. Based on my review of law enforcement reports and conversations with others, including information provided to the

FBI by an Food and Drug Administration ("FDA") Special Agent, I know that the FDA has regulatory authority over lasers in the United States. The FDA restricts the output power of visible lasers that can be sold to civilians to no more than 5 milliwatts ("mW"). The FDA regulates infrared lasers because these lasers are invisible, thus not causing a blink reflex, which may cause serious eye injury. Infrared lasers are restricted and generally cannot be sold to civilians. The lasers identified in this Affidavit are high-powered military laser aiming systems used to provide precise aiming of weapons during day and night operations. The LA-5B/PEQ laser is a higher power variant of the AN/PEQ-15 laser. The LA-5B/PEQ laser provides enhanced performance under direct sunlight and the higher power infrared illuminator allows users to reach out to much greater distances, using the illuminator as a pointer.

B. TANJAPATKUL Sells a Stolen LA-5/PEQ Laser in March 2023

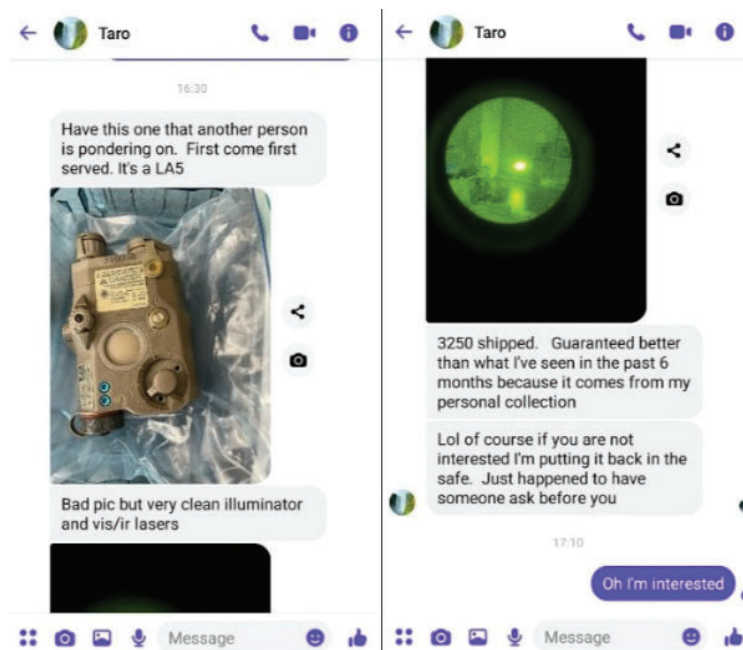
16. In February and March 2023, an FBI confidential human source (the "CHS")¹ communicated with TANJAPATKUL via Facebook Messenger to negotiate a sale of an LA-5/PEQ laser. The CHS provided the FBI with those communications. Based on my review

¹ The CHS is receiving payment and has received immigration benefits from the FBI. The FBI has corroborated the CHS's reporting on multiple occasions. Based on my communication with other law enforcement officers, I have learned that the CHS has a prior narcotics possession conviction in a foreign county.

of those communications, I have learned, among other things, the following:

a. On February 15, 2023, TANJAPATKUL, using a particular Facebook account (the "TANJAPATKUL Facebook Account"), told the CHS that he "might have" a few AN/PEQ-15 lasers and LA-5/PEQ lasers. According to the CHS, based on prior conversations, the CHS believed TANJAPATKUL meant that he had AN/PEQ-15 lasers and LA-5/PEQ lasers for sale.

b. On March 7, 2023, the CHS messaged TANJAPATKUL expressing interest in a AN/PEQ-15 laser or a LA-5/PEQ laser. TANJAPATKUL responded that he had an LA-5/PEQ laser available and sent a photograph of a tan laser aiming device with serial number 310958. The photograph and some of the messages TANJAPATKUL sent, using Facebook Messenger, are below:



The device displayed a danger label which indicated that its visible laser output power was 25 mW and its infrared output power was 100 mW, meaning that the laser was regulated by the FDA. TANJAPATKUL offered the laser for \$3,250 with shipping included. TANJAPATKUL stated the laser was from his personal collection and was better than what he had seen in the past six months. TANJAPATKUL told the CHS that he had another interested buyer. TANJAPATKUL told the CHS if he/she was not interested in the laser, TANJAPATKUL would put it back in his safe. TANJAPATKUL also told the CHS that this LA-5/PEQ laser was in great condition and had not been used. He stated the serial number on the body matched the label, which was in good condition. TANJAPATKUL told the CHS this LA-5/PEQ was not like other cheap units had had seen online.

17. Based on my communications with the CHS and my review of text messages between TANJAPATKUL and the CHS, I have learned, among other things, the following:

a. On March 8, 2023, TANJAPATKUL, using a particular telephone number ending in 0306 (the "0306 Phone Number"),² sent

² According to a U.S. Customs and Border Protection ("CBP") report, TANJAPATKUL provided the same telephone number to CBP during an interview when he entered the United States on November 8, 2022. Based on my review of subscriber information for the 0306 Phone Number, I have learned that it is subscribed to in the name of an individual who I believe to be TANJAPATKUL's spouse and the subscriber address the address for the TANJAPATKUL Residence. Additionally, during an interview on
(footnote cont'd on next page)

a text message to the CHS providing TANJAPATKUL's bank account and routing information so that the CHS could send him a wire transfer. TANJAPATKUL provided his name, "Arthit Tanjapatkul," or "A Tan," and his address as a particular location in Santa Ana, California (the "TANJAPATKUL Residence"). Based on my involvement in this investigation, I know that, at the direction of law enforcement, the CHS sent TANJAPATKUL a wire transfer of \$3,250. TANJAPATKUL confirmed receipt of the payment and told the CHS that he would send the laser. TANJAPATKUL also sent a photograph of the laser which appeared to match the first photograph he sent the CHS which showed serial number 310958. That photograph is below:



October 13, 2023, described in more detail below, TANJAPATKUL said the 0306 Phone Number was his telephone number.

18. On March 8, 2023, during the above referenced conversation, I conducted physical surveillance at the TANJAPATKUL Residence. Based on my communication with other law enforcement agents, I know that at approximately 3:54 p.m., TANJAPATKUL told the CHS that he had received the money and would be shipping the laser on that date. At approximately 4:17 p.m., I observed TANJAPATKUL exit the TANJAPATKUL Residence with a small, white United States Postal Service ("USPS") box and drive to a particular USPS store in Santa Ana. I also know, through communication with other law enforcement agents, that TANJAPATKUL passed that box over the counter for shipment at that USPS. I received the below photograph from an FBI Task Force Officer who watched TANJAPATKUL pass this box for shipment:



19. According to communications provided by the CHS which I have reviewed, TANJAPATKUL then messaged the CHS "Done. Now just a waiting game" with a photograph of a USPS transaction receipt, registered mail receipt, and white USPS Priority Mail Box (the "TANJAPATKUL Package").

20. Based on my communications with law enforcement officers and review of law enforcement reports, I know that on or before March 17, 2023, the CHS received in West Virginia the TANJAPATKUL Package. An FBI Special Agent opened the package and seized a tan colored LA-5/PEQ laser bearing serial number 310958. That item is now in the custody of the FBI.

C. The LA-5/PEQ Laser (serial number 310958) is Stolen U.S. Army Property

21. Based on my communications with a particular Defense Criminal Investigative Service ("DCIS") Special Agent, I know that the LA-5/PEQ laser (serial number 310958) was stolen military property at the time TANJAPATKUL possessed and sold it to the CHS on March 8, 2023.

22. Based on review of law enforcement reports, open-source research, and communications with the same DCIS Special Agent, I know the following:

a. In or about 2017 and 2018, CC-1 worked as a Chief Warrant Officer for the U.S. Army in Fort Bragg, North Carolina. During the time he worked for the U.S. Army, CC-1 stole a huge volume of U.S. Army equipment by taking equipment from his battalion, deleting the records of that equipment from the property books, and selling the equipment for personal profit. CC-1 stole an estimated \$2,000,000 worth of U.S. Army property.

b. CC-1 was charged in federal court, pleaded guilty to violating 18 U.S.C. § 641 (theft of government property) and 18 U.S.C. § 1025A(a)(1) (false pretenses), and was sentenced to a term of imprisonment.

c. Much of the property stolen by CC-1 has not been recovered.

d. Law enforcement reports and U.S. Army property records show that, on or about April 10, 2017, CC-1 deleted LA-5/PEQ laser (serial number 310958) from the property records. This act is consistent with CC-1's overall scheme to take military property and then delete the record of that item in property records, making it harder to detect his fraud.

23. Based on my review of law enforcement reports, communications with law enforcement officers, and PayPal records, I know PayPal records show that TANJAPATKUL sent approximately 150 payments to CC-1 between July 2015 and April 2019, totaling approximately \$277,000.

D. Additional Evidence of Online Laser Sales

24. As set forth below, other records show that TANJAPATKUL was selling a large volume of regulated lasers online, including other lasers stolen by CC-1.

25. Based on my review of PayPal and Venmo records, I have learned, among other things, the following:

a. A particular Venmo account is subscribed to in the name of "A Tan," which believe is a reference to TANJAPATKUL's first and last name, and lists as the subscriber address the TANAJPATKUL Residence (the "TANJAPATKUL Venmo Account").

b. In or about June 2022, TANJAPATKUL received three payments from a particular Venmo account for \$1, \$1, and \$2,034,

respectively. The subject of one of these transactions was "test for cat toys." Based on my training and experience, I know that lasers are commonly used as cat toys and this subject line is likely a cover for the \$2,034 payment for a high-powered laser, similar to the one TANJAPATKUL sold to a CHS in March 2023.

c. In or about June 2022, TANJAPATKUL received a payment for \$1,376 from another particular Venmo account. Again, the subject line referenced "cat toy."

d. In or about July 2022, TANJAPATKUL received one payment for \$2,070 from another particular individual ("CC-2"), with the subject "Food." A second payment for \$40 was sent with the subject "The rest." Based on review of law enforcement reports, I know that CC-2 was the subject of a prior FBI investigation when CC-2 was believed to be recruiting individuals who would dress in full tactical gear and train to engage in violent confrontations.

26. On or about June 30, 2023, the Hon. Charles F. Eick, United States Magistrate Judge, United States District Court for the Central District of California, authorized a warrant to search the TANJAPATKUL Facebook Account. See 2:23-mj-3314 (C.D. Cal.). Based on my review of the returns from that search warrant, I have learned, among other things, the following:

a. Many of the messages contained discussions about the sale of law enforcement and military equipment, including

LA-5/PEQ lasers. TANJAPATKUL frequently engaged with counterparties about the detailed specifications of the lasers.

b. On May 29, 2023, during a conversation with a Facebook Messenger user who expressed interest in buying lasers from TANJAPATKUL, TANJAPATKUL posted the following pictures:



E. The Search Of TANJAPATKUL's Residence Reveals Firearms, Including Machineguns

30. On or about October 6, 2023, the Hon. A. Joel Richlin, United States Magistrate Judge, United States District Court for the Central District of California, authorized warrants to search the TANJAPATKUL Residence, TANJAPATKUL's vehicle, and TANJAPATKUL's person (together, the "October 2023 Warrants"). See 2:23-mj-5174, 2:23-mj-5176, 2:23-mj-5178 (C.D. Cal.).

31. Based on my involvement in this investigation, my communications with other law enforcement officers, and my review of law enforcement reports, I have learned, among other things, the following:

a. On or about October 13, 2023, agents executed the October 2023 Warrants at the TANJAPATKUL Residence in Santa Ana. Officers approached TANJAPATKUL outside the residence and seized a particular Apple iPhone 7 Plus (the "TANJAPATKUL Cellphone"). Officers then entered and searched the TANJAPATKUL Residence.

b. Inside the TANJAPATKUL Residence, agents found a total of 72 firearms.³ Four of the firearms seized from TANJAPATKUL's residence had settings that permitted them to shoot automatically more than one shot, without manual reloading, by a single function of the trigger.⁴ Specifically, agents seized the following machineguns from the TANJAPATKUL Residence:

i. One AR-15 style, .556 caliber rifle, with Plumcrazy lower with an obliterated serial number and LWRC upper model number M6A2-S;

ii. One AR-15 style, .556 caliber rifle, with Plumcrazy lower with an obliterated serial number and Daniel Defense upper model number DDMM4V7;

³ Based on my communication with state law enforcement officers, I have learned that, of the 72 firearms, officers determined that 46 were not registered to TANJAPATKUL and none of the machineguns were registered to him. Many of the firearms were assault rifles, which TANJAPATKUL was also prohibited from possessing. See California Penal Code Section 30605(a).

⁴ As discussed below, these firearms have been tested for functionality and all operated as machineguns.

iii. One Polymer 80, AR-15 rifle, .556 caliber, Serial Number P9SX; and

iv. One AK-47 7.62 Caliber rifle, Serial Number S-AL2038.

c. A Santa Ana Police Department Forensic Ballistics Technician tested the four weapons and observed that they all shot multiple rounds with a single trigger pull, confirming that they were each machineguns.

32. Inside the TANJAPATKUL Residence, in addition to firearms, agents also found more property that was stolen by CC-1. Specifically, Based on my involvement in this investigation, my communications with other law enforcement officers, and my review of law enforcement reports, I have learned, among other things, the following:

a. On or about October 13, 2023, officers seized a number of items from the TANJAPATKUL Residence that agents suspected to be stolen military equipment, including infrared aiming lasers, weapon lights, weapon sights, thermal sights, night vision, and other firearms accessories. After seizing this evidence, I transmitted a list of items to DCIS.

b. A DCIS Special Agent notified me that at least 71 of the items seized from the TANJAPATKUL Residence on October 13, 2023, were stolen U.S. Government military property.

According to the DCIS Special Agent, these items were stolen by CC-1.⁵

33. Based on my involvement in this investigation and my review of law enforcement records, I know that agents also seized a particular hard drive ("Hard Drive-1") from inside the TANJAPATKUL Residence. Hard Drive-1 was seized from inside a black bag in the attic. As set forth below, inside Hard Drive-1, agents found child sexual abuse material.⁶

F. Search of TANJAPATKUL's Cellphone Reveals Evidence of Knowing Possession of the Machineguns

34. As set forth above, on or about October 13, 2023, officers seized the TANJAPATKUL Cellphone from TANJAPATKUL's person. Based on my review of a law enforcement report

⁵ On or about February 8, 2024, another FBI agent and I interviewed CC-1. CC-1 stated, among other things, that he did not recall the name Arthit TANJAPATKUL or username associated with the TANJAPATKUL Facebook account. CC-1 did, however, recall selling to an individual in California (the "California Subject") and he recalled the name of TANJAPATKUL's spouse. Based on my investigation, I believe that TANJAPATKUL resided in California during the period when CC-1 was stealing and selling military equipment. During my interview with CC-1, he stated, in sum and substance, that he and the California Subject never discussed that the gear was stolen. However, CC-1 believed the California Subject knew the deals were illegal.

⁶ On or about October 13, 2023, another law enforcement officer and I interviewed TANJAPATKUL. Among other things, TANJAPATKUL said he had previously worked as a federal firearms licensee ("FFL") and many of the items in his home came from that business. TANJAPATKUL described himself as a collector, trader, and hoarder of gear, and said he thought some of the gear in his possession had been rendered surplus by law enforcement or the military. He said he thought there was a gray area that allowed him to sell some of his gear online. When told the name of CC-1, he claimed that he did not recall the name. He also said he did not recall sending over \$270,000 to anyone.

describing the contents of the TANJAPATKUL Cellphone, I have learned, among other things, the following:

a. On or about April 8, 2014, TANJAPATKUL, using the TANJAPATKUL Cellphone, exchanged text messages with another individual using a phone number ending in 9585 (the "9585 Phone Number"). TANJAPATKUL sent a picture of a rifle to the 9585 Phone Number and told that person to look at the switch. The user of the 9585 Phone Number asked if it was full auto (i.e., had fully automatic firing, like a machinegun). TANJAPATKUL stated "funny what you can get on the Internet these days" . . . "Aisroft . . ." The user of the 9585 Phone Number later put "airsoft gun" in quotations. Based on my training and experience, "airsoft" is a reference to a popular type of replica firearm that shoots plastic pellets, rather than genuine ammunition. Based on my training and experience, TANJAPATKUL and the user of the 9585 Phone Number referred to the automatic weapons as "airsoft" guns as a joke or euphemism because the possession and sale of a fully automatic gun (i.e., a machinegun) is unlawful.

b. TANJAPATKUL sent the 9585 Phone Number a picture of a rifle lower with the selector switch in the fully automatic position. The law enforcement report notes that the picture of this rifle lower matches the AR-type .556 caliber fully automatic rifle with Plumcrazy lower and LWRC International

upper that was seized from the TANJAPATKUL Residence on or about October 13, 2023.⁷

c. The user of the 9585 Phone Number responded to this picture stating the owner was going to have to show them how to build one of the airsoft guns. Based on my training and experience, this is another joking or euphemistic reference to a fully automatic machinegun, as both participants know the possession or sale of a machinegun is unlawful.

d. On or about February 7, 2013, TANJAPATKUL, using the TANJAPATKUL Cellphone, exchanged text messages with another individual using a phone number ending in 3372 (the "3372 Phone Number"). Among other messages exchanged, TANJAPATKUL sent the user of the 3372 Phone Number a picture of a rifle lower with the selector lever in the full auto position. TANJAPATKUL said the rifle was his own, and he sent the user of the 3372 Phone Number the message "Pof FA" and another rifle with the message "FA AK." Based on my training and experience, my involvement in this investigation, and my review of www.pof-usa.com, I believe the first message refers to a "full-auto" Patriot Ordinance Factory weapon and the second message refers to a "full-auto"

⁷ Based on my training and experience, I believe that TANJAPATKUL's knowing reference to possessing a machinegun in 2014, which was seized from his home in 2023, shows that he has long-known that he possessed an illegal machinegun and that he was conscious of the difference between automatic and non-automatic firearms.

AK-style weapon. As set forth above, one of the machineguns that TANJAPATKUL kept in his home was an AK-style fully automatic weapon.

35. As set forth below, in or about August 2024, agents searched TANJAPATKUL's storage unit pursuant to a judicially authorized warrant. Records seized from a hard drive in the storage unit showed that TANJAPATKUL had various guides for converting certain firearms into fully automatic weapons.

G. Search of TANJAPATKUL's Hard Drive Shows Suspected Child Sexual Abuse Material

36. As set forth above, on or about October 13, 2023, agents seized Hard Drive-1 from inside the TAJAPATKUL Residence. Based on my communications with other law enforcement officers and my review of law enforcement reports, I have learned, among other things, the following:

a. On April 25, 2024, while reviewing Hard Drive-1 pursuant to the October 2023 Warrants, a particular FBI Special Agent ("Agent-1") observed video thumbnails which she stated clearly depicted child pornographic material.⁸

⁸ Agent-1 is not an agent specializing in child sexual abuse material, including child pornography. However, for the reasons set forth herein, such as the file names for pornographic material referencing youthful ages, I believe the materials she observed constitutes unlawful child pornography.

b. Agent-1 did not open the video files and was uncertain of the exact content; however, there were over 40 video thumbnail arrays which all appeared to have minor females.

c. The names/titles of many of these video had similar naming conventions, which included "Young Video Models" or "YVM" with a name, age and additional descriptors (ex. "Young Video Models - D05n - Daphne 9yo (60m, nude, dad))(youngvideomodels yvm).avi"). The labeled age ranges appeared to include females 7 years old to 15 years old.

d. One such video thumbnail array depicted a nude Caucasian female which appeared to be approximately 12 years old. The face of the young girl was visible and she was depicted in various positions, including sitting on the ground with her legs up in the air, exposing her vagina. The video file was titled "yvm_Irina # 5 Nude 12y).avi" The creation date was listed as 7/4/2008 and the date modified was listed as 7/14/2008. Based on my training and experience, the phrase "Irina # 5 12y" means that the woman in the video had the name or pseudonym "Irina" and she was 12 years old ("12y").

e. Another video thumbnail array depicted a nude Caucasian female which appeared to be approximately 7 years old. The face of the young girl was visible and she was depicted in various positions, including sitting on the ground with her legs spread open to display her vagina. In another thumbnail, the

girl was depicted bending forward, exposing her anus and vagina. The video file was titled "Young Video Models - Kr04 - Kristina 7yo (60m, topless) (youngvideomodels yvm).avi". Based on my training and experience, the phrase "Kristina 7yo" means that the woman in the video had the name or pseudonym "Kristina" and she was 7 years old ("7yo"). The creation date was listed as 6/20/2008 and the date modified was listed as 7/8/2008.

f. Another video thumbnail array depicted a nude Caucasian female, which appeared to be approximately 9 years old. The face of the young girl was visible and she was depicted in various positions, including laying on her side. The girl's vagina was exposed and it appeared that a white object was being inserted into her vagina. Later in the thumbnail array, there appeared to be a nude Caucasian adult male laying on his back. In various thumbnails of the same video, various sexual acts were depicted, including the young girl touching the adult male's penis, the young girl sitting on the adult male's torso and an adult hand touching the young girl's vagina. The video file was titled "Young Video Models - D05n - Daphne 9yo (60m, nude, dad) (youngvideomodels yvm).avi". The creation date was listed as 7/4/2008 and the date modified was listed as 7/9/2008. Based on my training and experience, the phrase "Daphne 9yo" means that the woman in the video had the name or pseudonym "Daphne" and she was 9 years old ("9yo").

g. There were numerous other video thumbnail arrays of females that had youthful appearance, many of which appeared to be exposing their vaginas and anuses and touching their vaginas.

H. The Search of TANJAPATKUL's Storage Unit Reveals More Firearms, More Stolen Equipment, and More Child Sexual Abuse Material

37. As set forth below, in or about August 2024, agents searched a storage unit rented by TANJAPATKUL. Inside the storage unit, agents found more firearms, more stolen military equipment, and more suspected child sexual abuse material.

38. During the course of this investigation, agents have learned that TANJAPATKUL paid for a particular storage unit (the "TANJAPATKUL Storage Unit") at a particular storage business in Santa Ana (the "Storage Business"). Specifically, based on my review of records provided by the Storage Business, the TANJAPATKUL Storage Unit was rented by "Arthit Tanjapatkul" beginning in or about August 2019. Based on communications with employees of the Storage Business and my review of banking records, I know that TANJAPATKUL continued to pay for the storage approximately monthly until June 2024, *i.e.*, just prior to the eventual search of the storage unit in July 2024.

39. On or about July 17, 2024, the Hon. Steve Kim, United States Magistrate Judge, United States District Court for the Central District of California, authorized a warrant to search

the TANJAPATKUL Storage Unit. On or about July 18, 2024, agents searched the TANJAPATKUL Storage Unit pursuant to the warrant.

40. Based on my personal involvement in the search, my communications with other law enforcement officers, and my review of law enforcement reports, I have learned, among other things, the following:

a. Inside the TANJAPATKUL Storage Unit, agents found evidence confirming TANJAPATKUL's use and control of the storage unit, including a receipt from an auto shop with TANJAPATKUL's name on it and shipping labels of packages addressed to TANJAPATKUL at the TANJAPATKUL Residence.

b. Agents seized approximately 38 firearms from the TANJAPATKUL Storage Unit. Out of those firearms, approximately 26 were not registered to TANJAPATKUL.

c. Agents seized a number of items from the TANJAPATKUL Storage Unit that agents suspected to be stolen military equipment, including lasers, night vision goggles, and firearm sights. After seizing this evidence, I transmitted a list of items to DCIS.

d. A DCIS Special Agent notified me that at least 192 of the items seized from the TANJAPATKUL Storage Unit were stolen U.S. Government military property. According to the DCIS Special Agent, these items were stolen by CC-1.

e. Inside the TANJAPATKUL Storage Unit, agents also seized, among other things, a particular Seagate-brand hard drive ("Hard Drive-2"), a particular Buffalo-brand hard drive ("Hard Drive-3"), and twelve CDs or DVDs containing suspected child sexual abuse material (the "TANJAPATKUL Disks"), as described below.

41. Based on my review of a law enforcement report describing the contents of Hard Drive-2, I have learned, among other things, that Hard Drive-2 contained a folder titled "Firearms Knowledge" with documents with the following titles:

- a. Full Auto Conversion - AR-15 Modification Manual
- b. Glock Full Auto Conversion
- c. Ruger Mini-14 Rifle - Full Auto Conversion
- d. [F]irearms - ! - Full- Auto Conversion - Colt M1911 & M1911A1 Pistol
- e. Firearms - ! - Full- Auto Conversion - Heckler&Koch Hk 91, Sr9, 93, 94, Sp89, Etc Rifle
- f. [F]irearms - ! - Full-Auto Conversion - Select Fire AK-47
- g. Firearms - AR15 - Full Auto Conversion - Colt Ar-15 Rifle
- h. Firearms - Full-Auto Conversion - Glock 17 Pistol

i. Based on my training and experience, I believe the documents described above are guides for converting firearms into fully automatic weapons.

42. Agents also identified material they believe to be child sexual abuse material on several CDs/DVDs found in the TANJAPATKUL Storage Unit. Specifically, based on my communications with a particular FBI agent who frequently investigates crimes against children ("Agent-2"), I have learned, among other things, that Agent-2 reviewed the contents of the TANJAPATKUL Disks. Of the twelve disks seized, one did not function or was not readable and one did not contain suspected child sexual abuse material. On the remaining ten disks, Agent-2 identified a total of approximately 79 videos and approximately 831 images containing suspected child sexual abuse material. Among the files found on the disks were the following:

a. A file named "Young Video Models - Daphne (9yo)-D52.avi." This file is a 26 minute and 46 second video depicting an approximately 9-year-old girl and an adult male. At the beginning of the video, the girl is completely naked. The girl removes the male's shorts and underwear. The male then lays on his back and the two engage in various sexual acts, including oral sex performed by and on each other, intercourse in multiple positions, and digital penetration of the girl's anus.

b. A file named "Doit4in1.jpg." This file is a still image collage of four pictures, each depicting the same nude

girl. The girl is approximately 6 or 7 years old. In the top left image, she is standing on a mattress, facing the camera, completely nude, with her right leg raised exposing her genitals to the camera. She is also raising her middle finger to the camera. The top right image appears to be the same image but is zoomed in and cropped to show only below the belly button and above the knee. The focus of the image is on her genitals. The bottom left image is the same girl lying on her back with her legs spread exposing her genitals to the camera. She is, again raising her middle finger to the camera. The image on the bottom right, appears to be an extreme closeup of the previous image. It is zoomed in to only show the girl's anus and genitals.

c. A file named "an-02.jpg." This file is a still image depicting a nude adult female and a nude pre-pubescent girl approximately between the ages of 10 and 12. The adult is lying on her back on mattress wither her legs spread and is touching her genitals with her left hand. The girl is standing to the adult's right, facing the camera, with one leg raised to put her foot up on the mattress. She is spreading her genitals open with both hands while the adult woman is inserting a finger on her right hand into the girl's vagina. (NOTE: The image appears to be a vintage image, possibly scanned from a magazine or other printed format. It is part of a series of images of the same nature and depicting the same woman and prepubescent girl.

In the series of images, the girl and the woman engage in various sex acts, including oral sex and insertion of an object into the girl's vagina. One of those other images has the title "Lolita: at the top followed by "colour special 2" "32 pages".

43. Based on my review of a law enforcement report describing the contents of Hard Drive-3, I have learned that, Among other things, Hard Drive-3 contained a PDF titled "Firearms - ! - Full Auto Conversion - Colt Ar-15 Rifle," which, based on my training and experience, is a tutorial on how to convert firearms into fully automatic weapons.

V. CONCLUSION

44. For the reasons set forth above, I submit that there is probable cause to believe Arthit TANJAPATKUL committed violations of 18 U.S.C. § 922(o) (unlawful possession of a machinegun).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this
8th day of October, 2024.



JOHN D. EARLY
UNITED STATES MAGISTRATE JUDGE